

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA	) Criminal No. 1:20-CR-143
	)
v.	) <u>Counts 1–5</u> : 18 U.S.C. § 2251(a) & (e)
	) Production of Child Pornography
ZACKARY ELLIS SANDERS,	)
	) <u>Counts 6–11</u> : 18 U.S.C. § 2252(a)(2) & (b)(1)
<i>Defendant.</i>	) Receipt of Child Pornography
	)
	) <u>Count 12</u> : 18 U.S.C. § 2252(a)(4)(B) & (b)(2)
	) Possession of Child Pornography
	)
	) <u>Forfeiture Notice</u> : 18 U.S.C. § 2253(a)

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**INDICTMENT**

June 2020 Term—at Alexandria, Virginia

**COUNTS ONE THROUGH FIVE**  
**(Production of Child Pornography)**

THE GRAND JURY CHARGES THAT:

In separate instances on or about the dates set forth below, within the Eastern District of Virginia, the defendant, ZACKARY ELLIS SANDERS, attempted to and did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported or transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was actually transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce and mailed, and which visual depiction was produced using materials that have been mailed, shipped, and transported in

and affecting interstate and foreign commerce, by any means, including by computer, to wit: digital visual depictions of different minors engaged in sexually explicit conduct on the following dates:

<u>Count</u>	<u>Date</u>	<u>Minor</u>
1	Between or about November 20, 2019 and on or about November 25, 2019	MINOR VICTIM 1
2	Between on or about November 10, 2019, and on or about November 14, 2019	MINOR VICTIM 2
3	Between on or about September 17, 2017, and on or about April 14, 2018	MINOR VICITM 3
4	Between on or about November 29, 2017, and on or about December 11, 2017	MINOR VICTIM 4
5	Between on or about May 8, 2017, and on or about October 21, 2017	MINOR VICTIM 5

(In violation of Title 18, United States Code, Section 2251(a) and (e).)

**COUNT SIX THROUGH ELEVEN**  
**(Receipt of Child Pornography)**

THE GRAND JURY FURTHER CHARGES THAT:

In separate instances on or about the dates set forth below, within the Eastern District of Virginia, the defendant, ZACKARY ELLIS SANDERS, attempted to and did receive a visual depiction using any means and facility of interstate and foreign commerce and that had been mailed, and had been shipped and transported in and affecting interstate and foreign commerce, and which contained materials which had been mailed and so shipped and transported, by any means, including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct, to wit: digital visual depictions of different minors engaged in sexually explicit conduct on the following dates:

<b><u>Count</u></b>	<b><u>Date</u></b>	<b><u>Minor</u></b>
6	On or about January 16, 2020	MINOR VICTIM 6
7	Between or about November 20, 2019 and on or about November 25, 2019	MINOR VICTIM 1
8	Between on or about November 10, 2019, and on or about November 14, 2019	MINOR VICTIM 2
9	Between on or about September 17, 2017, and on or about April 14, 2018	MINOR VICTIM 3
10	Between on or about November 29, 2017, and on or about December 11, 2017	MINOR VICTIM 4
11	Between on or about May 8, 2017, and on or about October 21, 2017	MINOR VICTIM 5

(In violation of Title 18, United States Code, Section 2252(a)(2) and (b)(1).)

**COUNT TWELVE**  
**(Possession of Child Pornography)**

THE GRAND JURY FURTHER CHARGES THAT:

In or about February 2020, within the Eastern District of Virginia, the defendant, ZACKARY ELLIS SANDERS, knowingly possessed at least one matter which contained a visual depiction that that had been mailed, or had been shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or which was produced using materials which had been mailed or so shipped or transported, by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, to wit: digital visual depictions of minors, including prepubescent minors and minors who had not attained 12 years of age, engaged in sexually explicit conduct stored on a Sandisk Cruzer Edge thumb drive, an HP Elite Book 755 laptop, a Lexar thumb drive, an HP laptop (S/N: 5CH1262Y5Y), and an HP laptop (S/N: CNF8255WH5).

(In violation of Title 18, United States Code, Section 2252(a)(4)(B) and (b)(2).)

**FORFEITURE NOTICE**

THE GRAND JURY HEREBY FINDS THAT:

The defendant, ZACKARY ELLIS SANDERS, upon conviction on any Count of this Indictment, and as part of the defendant's sentencing under Federal Rule of Criminal Procedure 32.2, shall forfeit to the United States any and all matters that contain visual depictions of minors engaged in sexually explicit conduct in violation of the charged offenses; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and any property, real or personal, used or intended to be used to commit or promote the commission of such offenses or property traceable to such property, including:

1. A Sandisk Cruzer Edge thumb drive;
2. An HP Elite Book 755 laptop;
3. A Lexar thumb drive;
4. An HP laptop (S/N: 5CH1262Y5Y);
5. An HP laptop (S/N: CNF8255WH5);
6. An Apple iPad (S/N: DMPVGGCPHDDV);
7. An Apple iPad (S/N: DMPHM3K7DVGF); and
8. An Apple iPhone (S/N: C39VJ0XDJCL6).

If property subject to forfeiture is not available, the government may seek an order forfeiting substitute assets.

(In accordance with Title 18, United States Code, Section 2253(a).)

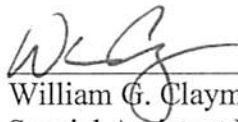
A TRUE BILL

Pursuant to the E-Government Act,,  
The original of this page has been filed  
under seal in the Clerk's Office

FOREPERSON

G. Zachary Terwilliger  
United States Attorney

By:



William G. Clayman  
Special Assistant United States Attorney (LT)

Jay V. Prabhu  
Assistant United States Attorney